

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

ROSY GIRON DE REYES; JOSE  
DAGOBERTO REYES; FELIX ALEXIS  
BOLANOS; RUTH RIVAS; YOVANA  
JALDIN SOLIS; ESTEBAN RUBEN MOYA  
YRAPURA; ROSA ELENA AMAYA; and  
HERBERT DAVID SARAVIA CRUZ,

*Plaintiffs,*

vs.

WAPLES MOBILE HOME PARK LIMITED  
PARTNERSHIP; WAPLES PROJECT  
LIMITED PARTNERSHIP; and A.J.  
DWOSKIN & ASSOCIATES, INC.,

*Defendants.*

Civil Action No. 1:16cv00563-TSE-TCB

**PLAINTIFFS' RULE 26(a)(3) PRETRIAL DISCLOSURES**

Plaintiffs Rosy Giron de Reyes, Jose Dagoberto Reyes, Felix Alexis Bolaños, Ruth Rivas, Yovana Jaldin Solis, Esteban Ruben Moya Yrapura, Rosa Elena Amaya, and Herbert David Saravia Cruz (“Plaintiffs”) respectfully submit their Pretrial Disclosures in the above-captioned action, pursuant to Rule 26(a)(3) of the Federal Rules of Civil Procedure and this Court’s July 28, 2016 and September 25, 2020 Orders (Dkt. Nos. 35, 297). Plaintiffs reserve the right to supplement, augment, or otherwise modify these disclosures based on circumstances that may evolve up until and during the time of trial.

- I. FRCP 26(a)(3)(A)(i):** the name and, if not previously provided, the address and telephone number of each witness—separately identifying those the party expects to present and those it may call if the need arises

Plaintiffs identify the following witnesses they expect to call at trial. Plaintiffs reserve the right to add and remove witnesses and to change the designation of witnesses’ testimony—e.g.,

from “may call” to “will call”—as appropriate and necessary. Plaintiffs also expressly reserve the right to call live or by deposition transcript: (1) any witness on Defendants’ witness list; (2) any witness necessary to establish a foundation for the admission of records or other evidence; and/or (3) any rebuttal/impeachment witness not listed here should the need arise.

Plaintiffs will call:

1. **Rosy de Beltrani Giron de Reyes**  
c/o Undersigned Plaintiffs’ Counsel
2. **Jose Dagoberto Reyes Vides**  
c/o Undersigned Plaintiffs’ Counsel
3. **Ruth Maday Rivas Abarca**  
c/o Undersigned Plaintiffs’ Counsel
4. **Felix Alexis Bolaños Berrios**  
c/o Undersigned Plaintiffs’ Counsel
5. **Esteban Ruben Moya Yrapura**  
c/o Undersigned Plaintiffs’ Counsel
6. **Yovana Jaldin Solis**  
c/o Undersigned Plaintiffs’ Counsel
7. **Rosa Elena Amaya Iraheta**  
c/o Undersigned Plaintiffs’ Counsel
8. **Herbert David Saravia Cruz**  
c/o Undersigned Plaintiffs’ Counsel
9. **Dr. William Arthur Valentine Clark**  
UCLA Geography  
Box 951524, 1255 Bunche Hall  
Los Angeles, CA 90095-1524  
(310) 273-0264
10. **Josephine Giambanco**  
c/o Reed Smith LLP  
7900 Tysons One Place, Suite 500  
McLean, Virginia 22101  
(703) 641-4200

Plaintiffs may call:

1. **Ivan Yacub, Esq.**  
Yacub Law Office  
12761 Darby Brook Court, Suite 102  
Woodbridge, VA 22192  
(703) 533-2347
2. **Mark Andrew Jones**  
c/o Reed Smith LLP  
7900 Tysons One Place, Suite 500  
McLean, Virginia 22101  
(703) 641-4200
3. **Peter Douglas Lawson Williams**  
c/o Reed Smith LLP  
7900 Tysons One Place, Suite 500  
McLean, Virginia 22101  
(703) 641-4200
4. **Albert Dwoskin**  
c/o Reed Smith LLP  
7900 Tysons One Place, Suite 500  
McLean, Virginia 22101  
(703) 641-4200
5. **Carolina Easton**  
c/o Reed Smith LLP  
7900 Tysons One Place, Suite 500  
McLean, Virginia 22101  
(703) 641-4200
6. **Brady M. Bustany**  
Corporate Counsel  
Yardi Systems, Inc.  
430 S Fairview Ave  
Santa Barbara, CA 93117  
800-866-1124 x1671
7. **Corporate Representative, RentGrow, Inc., d/b/a Yardi Resident Screening/Yardi Systems, Inc. (parent company)**  
c/o Brady M. Bustany  
Corporate Counsel  
Yardi Systems, Inc.  
430 S Fairview Ave  
Santa Barbara, CA 93117

- II. **FRCP 26(a)(3)(A)(ii):** the designation of those witnesses whose testimony the party expects to present by deposition and, if not taken stenographically, a transcript of the pertinent parts of the deposition

Plaintiffs do not anticipate presenting any witness testimony by means of a deposition at this time. Plaintiffs reserve the right to present deposition testimony should any witness become unavailable.

- III. **FRCP 26(a)(3)(A)(iii):** an identification of each document or other exhibit, including summaries of other evidence—separately identifying those items the party expects to offer and those it may offer if the need arises

Plaintiffs expect to offer as exhibits the documents listed in Appendix A. Certain of these exhibits may be used only if the need arises. Plaintiffs also reserve the right to use any exhibit listed on Defendants' exhibit list, and to use any additional material for impeachment and/or rebuttal. Plaintiffs reserve the right to add, remove, and change exhibits as appropriate based on circumstances as they may evolve during trial.

**IV. Statement of Undisputed Facts**

The parties have filed a Joint Stipulation of Uncontested Facts separately.

**Respectfully submitted,**

//s//

December 4, 2020

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*Counsel for Plaintiffs*

**Certificate of Service**

I hereby certify that on December 4, 2020, I caused the foregoing to be filed electronically with the Clerk of the Court using CM/ECF, which will then send a notification of such filing to all counsel of record.

\_\_\_\_\_/s/\_\_\_\_\_  
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Dated: December 4, 2020